

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP  
ONE MANHATTAN WEST  
NEW YORK, NY 10001

DIRECT DIAL  
212-735-2995  
DIRECT FAX  
917-777-2995  
EMAIL ADDRESS  
JOCELYN.STRAUBER@SKADDEN.COM

TEL: (212) 735-3000  
FAX: (212) 735-2000  
[www.skadden.com](http://www.skadden.com)

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May 17, 2021

**VIA CM/ECF**

Hon. Naomi R. Buchwald  
U.S. District Judge  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, NY 10007

RE: United States v. Rayquan Turner, 20-cr-302 (NRB)

Dear Judge Buchwald:

I represent Rayquan Turner in the above-captioned matter, in which sentencing is currently scheduled for June 21, 2021.

I write to respectfully seek an extension of approximately two weeks' time to file objections to the draft Pre-Sentence Report ("PSR") — currently due on May 17, 2021 — to May 28, 2021. We received the draft PSR from U.S. Probation Officer Ashley Geiser on May 3, 2021. Since receiving the draft PSR, we have encountered a number of logistical obstacles in contacting Mr. Turner, who is currently incarcerated in the Special Housing Unit of the New York Metropolitan Correctional Center. Despite multiple scheduled calls, we have been unable to fully and thoroughly review the draft PSR with Mr. Turner, and we therefore request this additional time to file our objections. This is Mr. Turner's first request for an extension of time to file objections.

AUSA Nichols and U.S. Probation Officer Geiser do not object to this request. Should your Honor grant the extension, Officer Geiser respectfully requests

*Application  
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an extension of two weeks for the PSR second disclosure, currently due May 28, 2021, to June 11, 2021.

Counsel is mindful that Mr. Turner's sentencing submission is due June 9, and the government's submission is due June 16. Should counsel require an extension of time for Mr. Turner's sentencing submission (in light of the extension requested herein), counsel will promptly contact the Court.

Respectfully submitted,

/s/ Jocelyn E. Strauber

Jocelyn E. Strauber

cc: Assistant U.S. Attorney Alison Nichols (via ECF)  
Assistant U.S. Attorney Jamie E. Bagliebter (via ECF)  
Officer Ashley Geiser, U.S. Probation Department (via email)